

Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-4, 7-13, 16-22 and 25-30 are pending in the application, with 1, 10, 19, and 28-30 being the independent claims. Claims 5-6, 14-15, and 23-24 were cancelled in a previous amendment. Claims 1, 10, 19, and 29 are amended. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Claim Objections

On page 3 of the Office Action, claim 29 was objected to because of informalities. Applicants have amended claim 29 to address the informalities in accordance with the Examiner's objections. Accordingly, Applicants request that the objection to claim 29 be reconsidered and withdrawn.

Allowable Subject Matter

Applicants acknowledge with appreciation the Examiner's indication that claims 9, 18, and 27-30 contain allowable subject matter, and that claims 28 and 30 are allowed.

Information Disclosure Statements

On page 2 of the Office Action, the Examiner contends that an IDS filed by Applicants on 9/19/01 failed to comply with the provisions of 37 C.F.R. § 1.97, 1.98, and

M.P.E.P. § 609 because, for references AR2, AT9, AR11, AR18, AT18, AT23, AS27, AT29, AR30, AT31, AT34, AS36, and AR37, pertinent pages are not identified. In response to Applicants' comments in the Reply filed on October 5, 2006, the Examiner cited 37 C.F.R. § 1.98 (b) (5) which requires that "[e]ach publication listed in an information disclosure statement must be identified by publisher, author (if any), title, relevant pages of the publication, date, and place of publication." The Examiner refers to the requirement of "relevant pages of the publication" to support his position.

Applicants respectfully disagree. It is Applicants' understanding that the requirement for "relevant pages of the publication" refers to the pages of the cited reference in the publication in which the cited reference is contained. In the case of an article in a journal, for example, this requirement refers to the pages in the journal in which the article appears. Applicants respectfully assert that this requirement is not relevant in the case of the documents at issue since the documents are either internet World Wide Web pages printed out or press releases.

Rejections under 35 U.S.C. § 112

On page 4 of the Office Action, claims 1-27 were rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Specifically, the Examiner alleges that the "wherein the serialized document table contains at least one pointer to object data in the content stream" clause as recited in claims 1, 10 and 19 is not discussed in the specification. Applicants respectfully point out that this aspect of the claims 1, 10 and 19 is disclosed in the present specification. For example, page 37, lines 17-26 of the specification includes a description of a

document table 206A that contains an attribute pointer 206C that points to a specific object in the content stream 206I. Moreover, pages 31-33 include a description in which various aspects related to the document are serialized. Applicants submit that the present specification provides sufficient description of a serialized document table that contains at least one pointer to object data in the content stream, as discussed in claims 1, 10, and 19 to convey to one skilled in the relevant art(s) that Applicants possessed the claimed invention at the time of the application was filed. Accordingly, Applicants respectfully request that this rejection be reconsidered and withdrawn.

Rejections under 35 U.S.C. § 101

On page 5 of the Office Action, claims 10-13, 16-18, and 29 were rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Applicants respectfully traverse this rejection, and request that it be withdrawn.

The Examiner states on page 6 of the Office Action that claims 10 and 29 "appear to be claiming 'software systems' i.e. systems without hardware indication, which is a computer program per se."

Applicants respectfully assert that the Examiner, in determining patentability of "means or steps plus function" claims under 35 U.S.C. § 112, sixth paragraph, "...may not disregard the structure disclosed in the specification corresponding to such language when rendering a patentability determination." M.P.E.P. § 2181, *citing In re Donaldson, Co.*, 16 F.3d 1189, 29 USPQ2d 1845 (Fed. Cir. 1994).

Accordingly, Applicants refer to pages 31-33 and FIG. 2D1 of the specification in which appropriate structure is disclosed corresponding to the claim language in claims

10 and 29. For example, on page 33, line 6, "*server 104* transmits the serialized document to client 108A..." and on page 32, line 20, "*server 104* encrypts the document content...." The server described in the specification provides "hardware indication" to the systems recited in claims 10 and 29. Hence, for at least the reasons stated above, Applicants assert that claims 10 and 29 are directed toward statutory subject matter. Accordingly, Applicants request that that the rejection of claims 10-13, 16-18, and 29 under § 101 rejection be reconsidered and withdrawn.

Rejections under 35 U.S.C. § 103

On page 6 of the Office Action, claims 1-3, 7-8 and 10-12, 16-17, 19-21, and 25-26 are rejected under 35 U.S.C. § 103(a) as being anticipated by U.S. Patent No. 6,925,595 to Whitledge et al. (hereinafter Whitledge), in further view of U.S. Patent No. 6,671,853 to Burkett et al. (hereinafter Burkett). Applicants respectfully traverse the rejection

Differences exist between the cited combination of references and the claimed embodiments of the present invention. For example, claim 1 recites the following:

serializing said document content into a content stream
according to said object-by-object basis, wherein said
content stream includes a plurality of objects.

Furthermore, claim 10 recites:

first means for serializing said document content into a
content stream according to said object-by-object basis,
wherein said content stream includes a plurality of objects.

Moreover, claim 19 recites:

a fifth computer readable program code means for causing
a computer to serialize said document content into a

content stream according to said object-by-object basis,
wherein said content stream includes a plurality of objects.

The cited combination of references does not teach or suggest these features.

Burkett describes parsing a document into a "DOM tree" and streaming the DOM tree or similar objects into a binary stream. After objects such as a DOM tree are streamed, they are known as "serialized" objects. A typical serialization process involves invoking a serialize method which writes the object to a stream in serial form. After completing the serialization process, the stream is written out to an alternate medium.

Thus, the cited portion of Burkett describes serializing an object into a binary stream and writing that stream to an alternate medium. Applicants respectfully point out that serializing a single object into a binary stream is not the same as serializing document content into a content stream including a plurality of objects according to an object-by-object basis, as recited in claim 1. In particular, an output of the system described by Burkett contains binary information corresponding to a single object, while an output of the serialization recited in claim 1 would include information corresponding to a plurality of objects. Therefore Burkett does not teach or suggest each and every element of claims 1-3, 7-8 and 10-12, 16-17, 19-21, and 25-26. Applicants further assert that Whitledge does not overcome the deficiencies of the Burkett with respect to claims 1-3, 7-8 and 10-12, 16-17, 19-21, and 25-26. Accordingly, Applicants request that this rejection be reconsidered and withdrawn, and that claims 1-3, 7-8 and 10-12, 16-17, 19-21, and 25-26 be passed to allowance.

On page 11 of the Office Action, claims 4, 13, and 22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Whitledge and Burkett, as applied to claims 1, 10 and 19 above, in view of U.S. Patent No. 6,665,709 to Barron (hereinafter Barron).

Claim 4 depends directly on claim 1, claim 13 depends directly on claim 10 and claim 22 depends directly on claim 19. The disclosure of Barron adds nothing to the disclosure of Whitledge and Burkett to overcome the deficiencies of the latter with respect to claims 1, 10, and 19. Claims 4, 13, and 22 are therefore patentable over Whitledge, Burkett, and Barron, alone or in any rational combination, for at least the same reasons as claims 1, 10, and 19, and further in view of their own features. Accordingly, Applicants request that this rejection be reconsidered and withdrawn, and that claims 4, 13 and 22 be passed to allowance.

Reply to Office Action of November 1, 2006

KLOBA *et al.*
Appl. No. 09/705,927

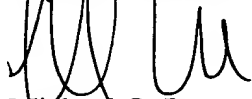
Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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